

# **EXHIBIT G**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN)  ECF Case
This document relates to:  <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN)  ECF Case

**DECLARATION OF MARK D. JOSEPH**

I, Mark D. Joseph, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I had just gotten off the elevator on the 22<sup>nd</sup> floor of One World Trade Center where my firm Anderson, Davis, & Cooper was located. As I walked towards my office there was an explosion in back of me and then the building swayed from side to side. I ran to the office and told people to leave and found a man hiding under a desk. I pulled him out and we went to the fire stairs. The door was difficult to open. I had just gotten down to the lobby when a set of elevator doors seemed to explode and a ball of fire engulfed someone who was running alongside of me across the lobby. I was terrified and couldn't believe

what I had just seen. As I walked outside, the second plane came overhead and I followed it with my eyes as it went into the South Tower. As I began to run uptown past the North Tower with several other people, there was a loud bang and jumpers killed two of the people who were running along side of me. I looked down and saw they did not have heads and I was covered with their insides. Bodies were exploding around me with a pink haze coming from the dead bodies. As I continued running, I was struck by something and knocked to the ground. I regained enough strength to pick myself up and realized I lost my upper front teeth and blood was coming from the top of my head where an object went into my scalp.

4. As a result of these terrorist attacks, I suffered the following specific injuries on September 11, 2001: I suffered injuries to my head and body when falling debris from the second plane hitting the South Tower struck me as I was escaping from the North Tower. Particles from this debris became lodged into my head, and I continue to have scarring and pressure headaches as a result. To this day, 18 years later, I do not sleep well and have debilitating headaches as a result of my head injury. I sought medical attention for my injuries immediately in order to have the particles from the falling debris removed from my head.

5. I suffered from and continue to suffer from severe PTSD. I saw the most horrific sights that stay with me morning, noon, and night. I feel like I was murdered, but lived. About ten weeks before September 11, 2001, my 22-year-old son died unexpectedly. I was reeling from his death and in tremendous despair when the horrific events of 9-11 occurred. For well over a year and three quarters, I did not function. I was in bed for months on end seven days a week, twenty-four hours a day. At the time, I was so traumatized by the day of 9-11, that the thought of suicide at that time was ever present and was becoming more attractive. I even had to

move to leave Manhattan, at the suggestion of my therapist. I am presently still under the care of medical doctors and two therapists.

6. I also have developed respiratory problems, including the presence of nodes on my lungs. I have never been a smoker. I have also been prescribed 15 different medications over the years to help me cope emotionally. As a result of these medications, my teeth have deteriorated and I have developed cardiac problems.

7. I suffered, and continue to suffer, severe emotional distress as a result of the above terrorist attacks. I suffered and continue to suffer from anxiety and bouts of depression due to the traumatic events of these terrorist attacks. Attached as Exhibit B to this Declaration is a true and correct copy of certain of my medical records related to the treatment that I received following the September 11, 2001 terrorist attacks.

8. I also have received very little financial assistance. No unemployment, no social security benefits, no workers compensation. The financial burden left as a result of my PTSD has only worsened my mental condition. I was forced to accept food stamps after being a successful, working citizen prior to 9-11. Attached as Exhibit C to this Declaration is a true and correct copy of certain of my financial records related to 9-11.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 10<sup>th</sup> day of January, 2020.

  
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Signature of Declarant, Mark D. Joseph

# **Exhibits Filed Under Seal**